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Via ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Jeanwilliam Chizungu*
15 Cr. 230 (ALC)

Dear Judge Carter:

As Your Honor is aware, I am counsel to Mr. Jeanwilliam Chizungu in the above-referenced violation of supervised release proceedings, appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. §3006A. This correspondence is to respectfully request the modification of Mr. Chizungu’s bail conditions.

Mr. Chizungu has been at liberty on the following bail package: (i) a \$100,000 PRB; (ii) co-signed by one FRP; (iii) home detention with GPS location monitoring; (iv) surrender of travel documents; (v) continued employment; and (vi) travel restricted to the District of Connecticut and Southern and Eastern Districts of New York. Since his release Mr. Chizungu has complied with all conditions of his bail and has been in constant contact with counsel and Probation.

This application seeks the permanent modification of Mr. Chizungu’s above-stated bail conditions, from home detention with GPS location monitoring, to a curfew with GPS location monitoring. The reason for this request is that Mr. Chizungu is transitioning from part-time to full-time employment, which requires greater time and geographical flexibility (within the District of Connecticut). In the event that the Court grants the instant request, all other bail conditions will remain unchanged.

Based upon my communications with A.U.S.A. Adam Z. Margulies and Probation Officer Michael Jones, the Government and Probation have no objection to this request.

Therefore, for the reasons stated herein, we respectfully request that the Court grant this application modifying Mr. Chizungu's bail conditions.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Richard J. Ma

Richard J. Ma, Esq.

cc: A.U.S.A. Adam Z. Margulies (via email)
Probation Officer Michael Jones (via email)

The application is **GRANTED**.

So Ordered.  7/3/24